



# CCTV / CAMERA POLICY

Nox Gymnastics Ltd

## 1. Policy Statement

NOX Gymnastics Ltd is committed to safeguarding children, young people, staff, and visitors. The use of CCTV supports this commitment by promoting transparency, safety, and security while respecting individual privacy rights.

This policy explains how CCTV is used, its limitations, and how footage is managed in accordance with data protection and safeguarding requirements.

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## 2. Purpose of CCTV Use

CCTV is used to:

- Support **child safeguarding and welfare**
- Provide **live viewing access for parents/carers**
- Assist in the review of **incidents, accidents, or safeguarding concerns**
- Support **club security**

CCTV is **not** used for:

- Continuous monitoring of staff or coach performance
  - Routine disciplinary monitoring
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### 3. CCTV System Overview

- The club operates a **Ring camera** located in the **main gymnastics training area only**
  - The camera provides a **live video feed** for observation purposes
  - Recording is **motion-activated**, meaning:
    - The system **does not record continuously**
    - Some parts of training sessions **may not be recorded**
    - CCTV **cannot be relied upon** to capture all activity or incidents
  - **Audio recording is technically enabled; however:**
    - Audio capture is **incidental**
    - Audio quality is **often unclear or unusable**
    - The club does **not rely on audio recordings** for supervision, monitoring, or investigation
  - The club **does not guarantee** that video or audio footage will be available for every session or event
  - There are **no cameras** in:
    - Changing rooms
    - Toilets
    - Offices
    - Any private or personal areas
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## 4. Live Viewing Access (Parents / Carers)

- Live viewing is available **only to parents or carers** of enrolled gymnasts
  - Live viewing is provided for **reassurance and transparency**
  - Parents/carers must:
    - Observe only
    - **Not record, screenshot, download, or share** any images or footage
  - Misuse of live viewing access may result in access being **restricted or withdrawn**
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## 5. Access to Recorded Footage

- **Only the Club Director** or a formally authorised **Safeguarding Lead** may access recorded footage
  - Footage will be accessed **only when necessary**, such as:
    - Safeguarding or welfare concerns
    - Incident or accident investigation
    - Insurance or legal requirements
  - Coaches, volunteers, parents, and gymnasts **do not have access** to recorded footage
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## 6. Data Storage, Retention & Deletion

- Footage is stored securely within the **Ring camera system**
- Under the club's Ring subscription plan, **video event history may be retained for up to 180 days**
- Retention is dependent on:
  - Motion detection
  - System activity
  - Ring service functionality
- Footage may be deleted automatically **before 180 days** and is **not guaranteed** to be available for the full period
- Once footage is deleted by the system, it **cannot be recovered**
- Footage is not downloaded or stored externally unless required for:
  - A safeguarding investigation
  - A legal or insurance request

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## 7. Data Protection & Legal Compliance

The club processes CCTV footage in accordance with:

- **UK GDPR**
- **Data Protection Act 2018**
- **ICO CCTV Code of Practice**



- **British Gymnastics Safeguarding Policies**
- **US SafeSport principles** (where applicable)

Key principles include:

- Lawful, fair, and transparent processing
- Data minimisation and limited retention
- Secure handling of personal data
- Respect for the privacy and dignity of children and adults

Clear signage is displayed on the premises to inform individuals that CCTV is in operation.

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## 8. Safeguarding Considerations

- CCTV is a **supplementary safeguarding measure**
- It does **not replace**:
  - Active supervision
  - Safe coaching practices
  - Clear safeguarding reporting procedures
- Due to motion-activated recording:
  - Footage may be **partial or unavailable**
  - Not all incidents or interactions will be captured



- CCTV footage should **not be considered a complete or definitive record** of events
  - Safeguarding concerns must always be reported through the club's **Safeguarding & Child Protection Procedures**, regardless of CCTV availability
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## 9. Subject Access Requests (SARs)

- Individuals may request access to footage in which they appear
  - Requests must be made **in writing**
  - Requests will be handled in line with **UK GDPR requirements**
  - Footage may be:
    - Redacted
    - Limited
    - Withheld  
where disclosure would impact the rights and privacy of others, particularly children
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## 10. Sharing of Footage

Footage will not be shared with third parties unless legally required, including:

- Local safeguarding authorities
- British Gymnastics
- Law enforcement



- Insurers

Any sharing will be **necessary, proportionate, and documented.**

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## 11. Policy Review

This policy will be reviewed:

- Annually
  - Following changes to CCTV equipment or service plans
  - After any significant safeguarding or data protection update
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